Department of Toxic Substances Control

Mathew Rodriguez
Secretary
Environmental Protection

Deborah O. Raphael
Director
9211 Oakdale Avenue
Chatsworth, California 91311

Edmund G. Brown Jr.
Governor

October 6, 2011

Mr. David Thaete
Phibro-Tech, Inc.
8851 Dice Road
Santa Fe Springs, California 90670

April 2011 Quarterly Sampling Report, Phibro-Tech Inc., Santa Fe Springs, California

Dear Mr. Thaete:

The Department of Toxic Substances Control (DTSC) has reviewed the *April 2011 Quarterly Sampling Report, Phibro-Tech Inc., Santa Fe Springs, California* (Report), dated August 8, 2011. Iris Environmental prepared the Report on behalf of Phibro-Tech, Inc. (PTI). The Report provides a description of the April 2011 quarterly groundwater monitoring activities and the physical and chemical groundwater data. The Report also provides groundwater elevation, movement and chemistry trends observed during this quarterly monitoring period.

Comments developed during review of the Report are summarized below:

- Please provide DTSC with at least 10 business days notice prior to all field work.
- Please elaborate that the source of the chemicals of concern found in legacy wells near Pond 1 are believed to be from Pond 1 and the former chromic acid tank in future groundwater monitoring reports.
- PTI should continue to include MW-04 and MW-09 in the quarterly groundwater monitoring program until DTSC determines that they can be abandoned and installation of appropriate replacement wells is complete.
- Please use the higher hexavalent chromium value from the duplicate groundwater sample collected from MW-04 in January 1999 and correct Figure 12 to reflect this spike. Always report the higher concentration value from duplicate samples collected for chemical analysis.

For more details, please find the enclosed DTSC comments regarding the document. If you have any questions, please contact Mr. Steve McArdle, Project Manager, at (818) 717-6564 (e-mail address: smcardle@dtsc.ca.gov).

Sincerely,

Steve McArdle, C.E.G.
Project Manager
Brownsfield and Environmental
Restoration Program

Ray Grutzmacher, R.G.
Engineering Geologist
Geologic Service Unit

Enclosures:

(1) Memorandum
Geologist Service Unit – Chatsworth Office
July 25, 2011

cc: Mr. Christopher S. Alger, PG, CEG, CHG
Iris Environmental
1438 Webster Street, Suite 302
Oakland, California 94612

Mr. Zachary R. Walton, Attorney at Law
SSL Law Firm, LLP
575 Market Street, Suite 2700
San Francisco, California 94105

Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Deborah O. Raphael, Director
9211 Oakdale Avenue
Chatsworth, California 91311

Edmund G. Brown Jr.
Governor

MEMORANDUM

TO : Stephen McArdle
Project Manager
Brownfields and Environmental Restoration Program - Chatsworth

FROM : Raymond Grutzmacher, PG
Engineering Geologist
Office of Geology - Chatsworth

CONCUR : Craig Christmann, PG
Senior Engineering Geologist
Office of Geology - Chatsworth

DATE : October 6, 2011

SUBJECT: April 2011 Quarterly Sampling Report
Phibro-Tech, Inc.
Santa Fe Springs, California 90670
Dated August 8, 2011

PCA: 25040 Site Code 300142-33 MPC: 206 Log No.: 20008798

Geological Service Unit (GSU) staff was requested to review the above referenced document and provide comments on the content and conclusions presented therein. The report was prepared for Phibro-Tech, Inc. (PTI) by Iris Environmental (Iris). The report discusses groundwater monitoring activities associated with the collection and analyses of groundwater samples from monitoring wells on and near the subject property located at 8851 Dice Road, Santa Fe Springs, CA (Site).

Based on this review of the Report, GSU has the following comments. Questions regarding this memo should be directed to Ray Grutzmacher at (818) 717-6621.

General Comment:

1. For the past two sampling events, the GSU has recommended that the facility give notification to the DTSC of planned field work a minimum of 10 business days ahead of all field work, including quarterly groundwater sampling, so that arrangements can be made for field oversight. Please begin giving notification for any and all field work at the Site.

Specific Comments:

1. Page 1-1, Section 1.2. Iris continues to state that dissolved metals, non-chlorinated aromatic volatile organic compounds and chlorinated VOCs have historically been detected in legacy wells located in the vicinity of Pond 1. In July 2011, GSU recommended that Iris elaborate on this and include discussion that the predominant source of these COCs is believed to be from the chromic acid UST removed in approximately 1981 and located northeast of Pond 1.

2. Page 1-1, Section 1.2. Iris states that improper construction of Pond 1 compliance wells MW-04 and MW-09 contributed to the elevated hexavalent chromium detections. As stated in our comment of July 2011, GSU agrees that the wells were improperly constructed and may be a contributing factor regarding elevated hexavalent chromium in groundwater. It is our opinion that other factors may also have contributed to hexavalent chromium leaching through the unnamed aquitard and into the Hollydale aquifer. Since these wells have been determined to be compliance related wells with specific regulatory restrictions, PTI should continue to include these wells in their quarterly monitoring program until appropriate replacement wells are installed and DTSC determines that they can be abandoned.

3. Page 6-3, Section 6.3. Iris states that hexavalent chromium concentrations have decreased from a high of 120 mg/L in July 1989. As stated in GSU's comment of July 2011, please correct your statement and include the 124 mg/L hexavalent chromium in the duplicate sample obtained for monitoring well MW-04 in January 1999. When duplicate samples are obtained for chemical analysis, unless a demonstrable problem exists with the laboratory analysis that causes the duplicate value to be suspect, the higher of the two values should be used for reporting purposes. Please also correct the trend analysis presented in Figure 12 to show this spike in hexavalent chromium concentration in 1999.